

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
SOUTHEASTERN DIVISION**

TARELL A. ADAMS,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No. 4:17CV1805 DDN
	)	
RYAN HILLIS, et. al.,	)	
	)	
Defendants.	)	

**Farmington Correctional Center’s Motion for a Protective Order  
Limiting Scope of Deposition Under Rule 30(b)(6)**

Third party Farmington Correctional Center (“FCC”), by and through counsel, hereby moves for entry of a protective order limiting the scope of the deposition of FCC under federal rule of civil procedure 30(b)(6) on December 3, 2019. Plaintiff’s Rule 30(b)(6) notice is deficient because many of the topics listed are not described with reasonable particularity, are vague, ambiguous, pose an undue burden on FCC, and are not proportional to the needs of the case, and are unreasonably cumulative of prior discovery. In support of this motion, FCC directs the attention of the Court and Plaintiff to the memorandum of law filed contemporaneously herewith.

WHEREFORE, FCC respectfully requests this Court enter a protective order limiting the scope of deposition under Rule 30(b)(6) and for any other relief the Court deems just and proper.

Respectfully submitted,

**ERIC S. SCHMITT**  
Attorney General

/s/ Justin Moore  
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**CERTIFICATE OF SERVICE**

I hereby certify that on this 21<sup>st</sup> day of November, 2019, the foregoing was filed electronically with the Clerk of the Court to be served upon all parties by operation of the Court's electronic filing system.

/s/ Justin C. Moore  
Assistant Attorney General